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*Attorneys for Plaintiff*  
LAURI VALJAKKA

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
**OAKLAND DIVISION**

**LAURI VALJAKKA,**

Plaintiff,

v.

**NETFLIX, INC.,**

Defendant.

Case No. 4:22-SC-01490-JST

**DECLARATION OF WILLIAM P.  
RAMEY, III IN SUPPORT OF  
PLAINTIFF'S UNOPPOSED MOTION  
FOR LEAVE TO AMEND OR  
SUPPLEMENT INFRINGEMENT  
CONTENTIONS**

Hearing date: July 25, 2023  
Time: 2:00 p.m.  
Judge: Hon. Jon S. Tigar  
Courtroom 6 – 2nd Floor

I, William P. Ramey, III, declare as follows:

1. I am over the age of 18, and I am Plaintiffs' counsel of record in the above-captioned case. I would and could competently testify as set forth below in a court of law.

2. Plaintiff's experts completed their review of Netflix's source code on June 9, 2023. Valjakka's counsel, including me, has spent the last week drafting, reviewing, and revising Plaintiff's proposed amended infringement contentions.

3. On June 15, 2023 I sent a copy of Plaintiff's Supplemental Infringement Contentions regarding U.S. Patent 8,495,167 to Netflix's counsel, Elise Edlin. A true and correct copy of said Supplemental Infringement Contentions is attached as Exhibit A.

4. I met and conferred with Elise Edlin on June 14, 2023 regarding the instant motion, and she confirmed Netflix would not oppose the motion on June 16, 2023.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed June 16, 2023 at Houston, Texas.

/s/ William P. Ramey, III

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William P. Ramey III